

NOWELL AMOROSO KLEIN BIERNAN, P.A.
COUNSELLORS AT LAW

DANIEL C. NOWELL
HENRY J. AMOROSO
HERBERT C. KLEIN
WILLIAM D. BIERNAN†
VICTOR J. HERLINSKY, JR.
ANTHONY PANTANO*
DAVID EDELBERG*
LINDA DUNNE
MICHAEL J. PALMA* □
MICHAEL J. NOONAN
WILLIAM C. SOUKAS*
BRADLEY M. WILSON†
JOHN R. LLOYD □
THOMAS C. MARTINI

JOSEPH S. SHERMAN
ALEXANDER J. DRAGO *
COUNSEL

155 POLIFLY ROAD
HACKENSACK, NEW JERSEY 07601
(201) 343-5001
Facsimile: (201) 343-5181

E-Mail: info@nakblaw.com

New York Office
PMB 46028
140 Broadway
New York, NY 10005
(212) 858-7710
Facsimile: (212) 858-7750

GREGORY K. ASADOURIAN
ROMAN D. BULLOCK
ANTHONY J. MARCHESE*
LISA J. JURICK
MICHELLE E. RADIN*

ARTHUR MINUSKIN
ANTHONY J. FRESE
KAREN A. PASSARO
JOHN G. HUDAK
RAKESH J. DESAI
OF COUNSEL

* Also Admitted in NY
† Also Admitted in the
Federal Courts in NY
□ Also Admitted in PA

January 4, 2011

VIA CM/ECF

Honorable Renee Marie Bumb, U.S.D.J.
United States District Court
For the District of New Jersey
Mitchell H. Cohen Courthouse
1 John F. Gerry Plaza
Camden, New Jersey 08101

**RE: Holtec International Corporation v. Preferred Metal Technologies,
Inc. v. UPS Ground Freight, Inc. d/b/a UPS Freight f/k/a Overnite
Transportation
Civil Action No. 09-CV-274(RMB/AMD)
Our File No. 2514.114**

Dear Judge Bumb:

We represent the Third-Party Defendant, UPS Ground Freight, Inc. d/b/a UPS Freight f/k/a Overnite Transportation ("UPS Freight").

We write to respectfully request an extension of the return date of our motion for summary judgment from January 18, 2011 to January 31, 2011. This request is respectfully made so UPS Freight may file and serve its response to Third-Party Plaintiff's opposition to UPS Freight's Motion for Summary Judgment on January 24, 2011 instead of the current date of January 10, 2011. We previously invoked Local Civil Rule 7.1(d)(5) and this is our second request. All counsel have graciously consented to our request.

This requested extension would not impinge or affect any other dates set by the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,

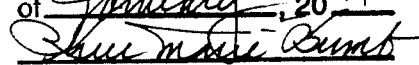
Nowell Amoroso Klein Bierman, PA


S/ Thomas C. Martin

Thomas C. Martin

TCM/bb

Cc: Honorable Ann Marie Donio, U.S.M.J.
Abigail Bowen, Esq.
Steven Kudatzky, Esq.

So Ordered this 4th day
of January, 2011

RENÉE MARIE BUMB
United States District Judge